



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

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Order Instituting Rulemaking to
Implement the California Renewables
Portfolio Standard Program.

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Rulemaking 04-04-026
(Filed April 22, 2004)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
2006 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN

PUBLIC VERSION

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Pursuant to Decision (D.) 05-07-039, D.05-10-014, and the November 9, 2005 Assigned Commissioner and Administrative Law Judge's Ruling Requiring Submission of RPS Procurement Plans, Draft Requests for Offers, and Transmission Ranking Cost Reports for 2006 (ACR), Southern California Edison Company (SCE) respectfully submits the following 2006 Renewables Portfolio Standard (RPS) procurement plan (2006 Plan).

The ACR set forth certain elements that must be included in the utilities' 2006 RPS procurement plans. SCE's 2006 Plan addresses each of the topics identified by the ACR.¹

I.

INTRODUCTION

On March 7, 2005, SCE filed its long-term RPS procurement plan for the period 2005-2014 (Long-Term Plan). The Commission approved the short-term portion of SCE's Long-Term Plan covering 2005 only in D.05-07-039.² The

¹ SCE intends to issue a 2006 Request for Offers (RFO) that is substantially identical to its 2005 RFO, which was approved by the Commission in D.05-07-039. Accordingly, SCE does not file a new draft RFO for 2006. SCE will file the time-of-delivery profiles for its 2006 RFO on January 10, 2006, as directed by the Commission in D.05-12-042. D.05-12-042, *mimeo.*, at 57.

² D.05-07-039, *mimeo.*, at 43.

Commission conditionally approved SCE's entire Long-Term Plan in D.05-10-014, but requested that SCE and the other utilities make supplemental filings addressing certain issues, including transmission, in greater detail.³ On December 7, 2005, SCE filed the supplement to its Long-Term Plan requested in D.05-10-014 (Supplement).⁴

SCE's Supplement identified a number of transmission-related issues that must be addressed promptly for SCE to attain the overall RPS goal of 20% renewables. SCE proposed a number of specific and readily achievable steps that can and should be taken collaboratively by the Commission, SCE, and other stakeholders to streamline and expedite the licensing process for new transmission facilities in order to facilitate the development of eligible renewable energy resources and the achievement of the State's 20% RPS goal. In addition, SCE once again emphasized the need for the Commission to implement the backstop cost recovery mechanism in Public Utilities Code section 399.25(b)(4) to facilitate SCE and the other utilities proactively pursuing transmission development instead of waiting for renewable generators to initiate the process. Finally, SCE proposed modifications to the Commission's flexible compliance rules to account for the long-lead times for new renewable projects and the time that is required to build transmission for these projects.

The concerns raised in the Supplement are particularly acute with respect to 2006 planning because deliveries expected with respect to contracts executed in 2006 (and most likely, in 2007) must commence in approximately three years in order for SCE to obtain full RPS credit towards its RPS goal by 2010.⁵

³ D.05-10-014, *mimeo.*, at 1.

⁴ See Southern California Edison Company's (U 338-E) Supplement to its Renewable Procurement Plan 2005 – 2014 (filed Dec. 7, 2005).

⁵ As noted in Section IV, SCE proposes changes to the Commission's flexible compliance rules which would extend earmarking to permit the counting of resources coming on-line after 2010 to count towards the 2010 target, so long as the contract generating the deliveries is executed in or before the 2010 target year.

As the Commission knows, SCE is currently conducting its 2005 RFO pursuant to the authority granted in D.05-07-039. SCE has not completed its bid evaluation and ranking process for its 2005 RFO; and it is unlikely that SCE will know the results of its 2005 RFO until approximately May 2006. Until SCE completes its 2005 RFO, it is somewhat premature to discuss lessons learned from that RFO. In addition, the final results of SCE's 2005 RFO will necessarily affect the level of procurement activity required in connection with SCE's 2006 RFO.

II.

SCE'S 2006 RPS PROCUREMENT PLAN

SCE's RPS procurement plan for 2006 is straightforward: In its 2006 RFO, SCE intends to contract for the balance of renewable power necessary to achieve 20% renewables by 2010 after it has completed its 2005 RFO. Because the level of necessary procurement activity associated with SCE's 2006 RFO is contingent on the results of its as yet uncompleted 2005 RFO, SCE describes its current and projected procurement levels and provides a discussion of the status of its 2005 RFO. This discussion essentially lays out a range of necessary procurement activity in 2006 and 2007 to reach the overall procurement volume required to meet 20% renewables by 2010.

A. Current Procurement Position and Projected Procurement Needs

SCE's projected procurement needs to reach 20% by 2010 depend on an assessment of several variables, including a projection of UDC bundled sales; the amount of load in SCE's service territory served by direct access providers; and the anticipated level of output from baseline (*i.e.*, pre-2002 contracts), contracts entered into as a result of SCE's 2002 solicitation, and contracts entered into as a result of SCE's 2003 solicitation. For the purposes of analysis, SCE developed high procurement needs, base case procurement needs, and low procurement needs scenarios, each of which assumes alternative combinations of UDC bundled sales

and output from existing resources. In order to maximize its compliance prospects, SCE plans to procure for the high procurement needs scenario even though it recognizes that the assumptions underlying that scenario may result in an overstatement of its required procurement.

The 2010 high procurement needs, base case procurement needs, and low procurement needs scenarios are presented in *Figure 1*.

Figure 1

		High Procurement Requirement	Base Case Procurement Requirement	Low Procurement Requirement
A	2003 Solicitation	- 5 of 8 projects at 100% Initial Capacity* - Stirling is not built - Green Borders & Mountain View not on by 2010 (361 GWh)	- 5 of 8 projects at 100% Initial Capacity - Stirling at 23% of Initial Capacity** - Green Borders & Mountain View not on by 2010 (601 GWh)	- 4 of 8 projects at 25% of Expansion Potential*** - Stirling at 23% of Initial Capacity - Green Borders & Mountain View not on by 2010 - Aero at Initial Capacity only (775 GWh)
B	2002 Solicitation	Low Production (21 GWh)	Contract Production (39 GWh)	High Production (40 GWh)
C	Pre-2002 Contracts	5 yr Low Production (9,656 GWh)	5 yr Average Production (10,032 GWh)	5 yr High Production (10,463 GWh)
D	Retail Sales	+ 1 Std Dev (94,990 GWh)	Oct 2005 Base Frctst (93,148 GWh)	- 1 Std Dev (91,306 GWh)
E	Direct Access	Base Case (9,982 GWh)	Base Case (9,982 GWh)	Base Case (9,982 GWh)
2010 Forecast (GWh)	$F = D - E$	Bundled Sales at Customer Meter 85,008	83,166	81,324
	G	20% APT Requirement 20.00%	20.00%	20.00%
	$H = F \times G$	Total Renewable Requirements 17,001	16,633	16,265
	$I = A + B + C$	Existing Renewables 10,038	10,672	11,278
	$J = H - I$	Future Procurement Need (May include re-contracting) 6,963	5,961	4,987
		Contracts Expiring by 2010 (GWh) 3,066	3,066	3,066

* "Initial Capacity" refers to the initial on-line capacities of the 2003 solicitation projects, as indicated in the advice letters seeking approval of the 2003 solicitation contracts.

** The SES Solar One LLC (Stirling) project will be built in phases pursuant to the project's contract with SCE, and it is not anticipated that the project will be built to its full 500 MW initial on-line capacity, as indicated in the advice letter seeking approval of the Stirling contract, by 2010. SCE's base case and low procurement needs scenarios assume that the Stirling project will be built at 23% of the 500 MW initial on-line capacity of the project by 2010.

*** "Expansion Potential" refers to expansion potentials of the 2003 solicitation projects, as indicated in the advice letters seeking approval of the 2003 solicitation contracts.

SCE has 25 contracts scheduled to expire by the end of 2010. These contracts are reflected in the last line of **Figure 1**, and total 455 MW of on-line capacity, producing 3,066 GWh of output per year. This expiring contract output is *included* as future procurement need in the second to last row of **Figure 1**. Thus, if SCE were to recontract with all of these projects, the overall procurement need in each of the high, base case, and low procurement needs scenarios would be reduced by 3,066 GWh. It is difficult to predict with any certainty the likely rate of recontracting.

1. High Procurement Needs Scenario

The high procurement needs scenario assumes that in 2010, SCE will have greater than anticipated load growth (+1 standard deviation above SCE's October 2005 forecast, or 94,990 GWh), its forecasted level of direct access (9,982 GWh), the five-year historical low production level from pre-2002 resources (9,656 GWh), and low historic production from resources for which SCE contracted pursuant to its 2002 solicitation (21 GWh). With respect to SCE's 2003 solicitation projects, the high procurement needs scenario assumes that the Stirling project will not be built, that the Green Borders Geothermal, LLC (Green Borders) and Mountain View Power Partners IV, LLC (Mountain View) projects will not come on-line by 2010, and that the other five of the eight projects being developed pursuant to SCE's 2003 solicitation will achieve their initial on-line capacities by 2010. These assumptions

yield net output in 2010 for the 2003 solicitation projects of 361 GWh. In the high procurement needs scenario, SCE must procure additional renewable output sufficient to produce an incremental 6,963 GWh of deliveries in 2010. In the event that SCE recontracts with all existing resources whose contracts expire prior to the end of 2010, the total additional procurement need would be reduced to 3,897 GWh in 2010.

2. Base Case Procurement Needs Scenario

The base case procurement needs scenario assumes that in 2010, SCE will have load growth as expected based on its October 2005 forecast (93,148 GWh), its forecasted level of direct access (9,982 GWh), production equal to the five-year historical average level from pre-2002 resources (10,032 GWh), and production from resources acquired through SCE's 2002 solicitation at the contract level times 90% availability (39 GWh). For the base case procurement needs scenario, SCE also assumed that five of the eight projects being developed pursuant to SCE's 2003 solicitation will achieve their initial on-line capacities by 2010. With respect to SCE's other three 2003 solicitation projects, SCE assumed that the Stirling project will be at 23% of its initial on-line capacity by 2010, and that the Green Borders and Mountain View projects will not be on-line by 2010. These assumptions produce net output in 2010 for the 2003 solicitation projects of 601 GWh. In the base case procurement needs scenario, SCE must procure additional renewable output sufficient to produce an incremental 5,961 GWh of deliveries in 2010, or 2,895 GWh of incremental deliveries in the event that SCE recontracts with all existing resources that expire prior to the end of 2010. *Figure 2* illustrates the base case procurement needs scenario assuming the current level of contractual commitments (i.e., contract terminations occur without recontracting).

Figure 2

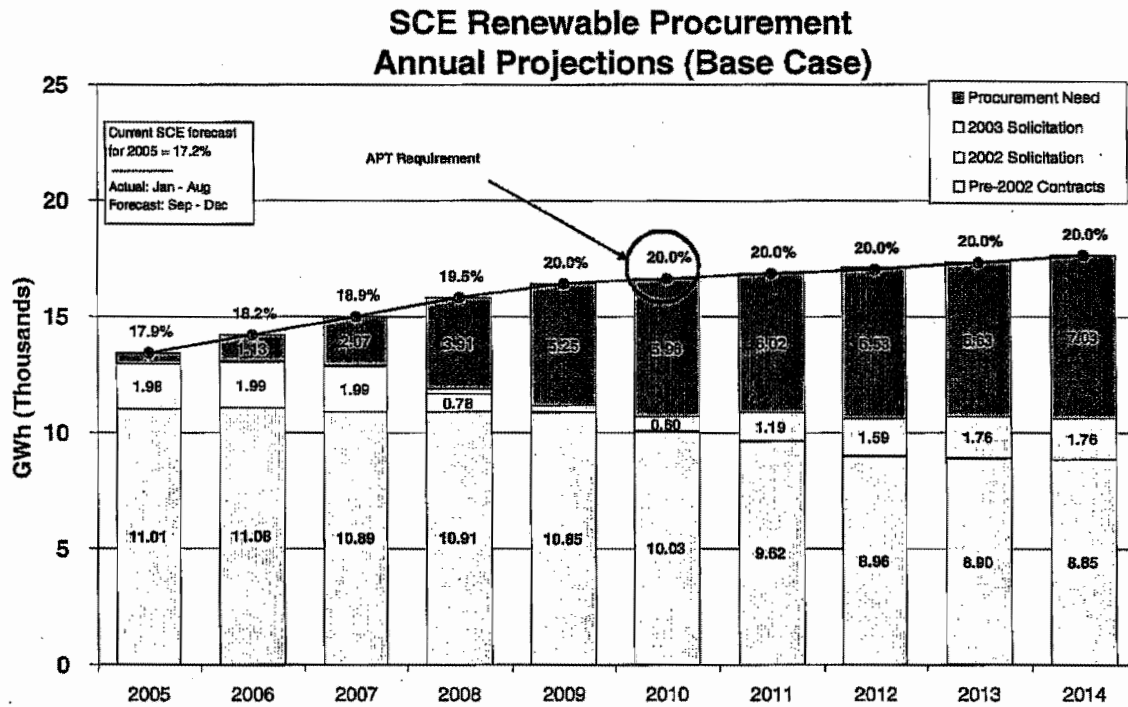
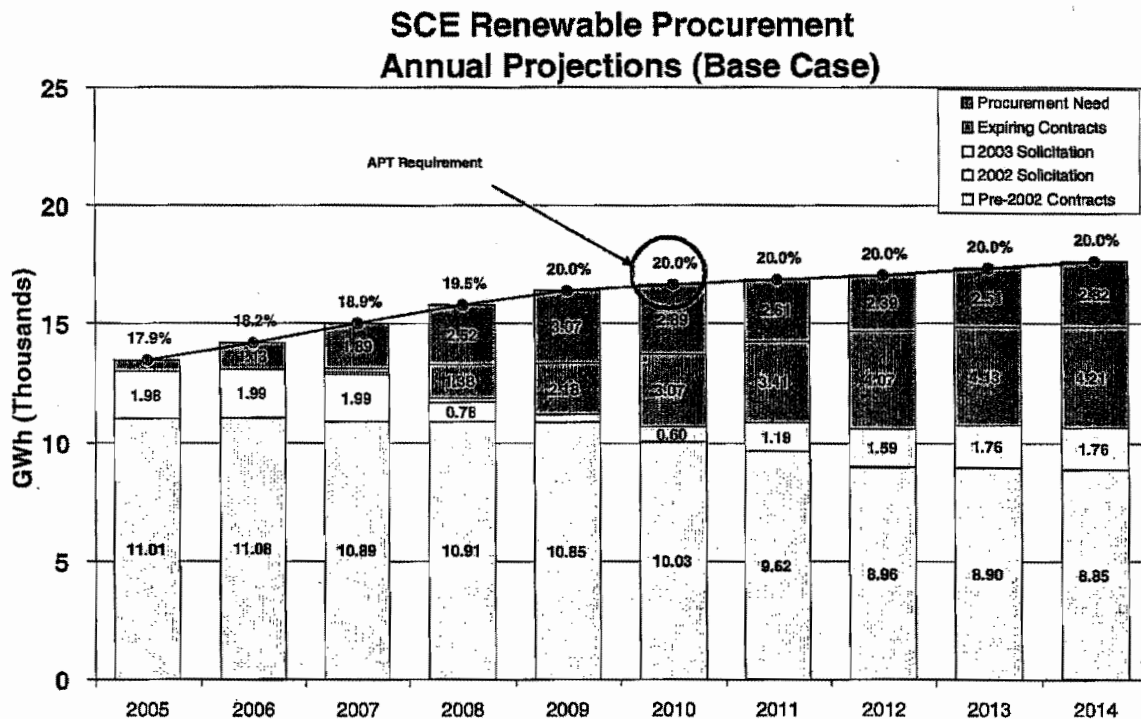


Figure 3 shows the base case level of procurement needed to achieve 20% in 2010 in the event that SCE recontracts with all renewable projects with expiring contracts prior to the end of 2010.

Figure 3



At year end 2005, SCE projects that its overall renewable procurement position will be approximately 17.2% of retail sales. This is somewhat lower than SCE's forecast earlier this year as a result of higher than anticipated load growth, reduction in the amount of load in SCE's service territory served by direct access providers, and below average production from existing resources. This demonstrates the sensitivity of RPS forecasting to load fluctuation and output from renewable resources.

3. Low Procurement Needs Scenario

As shown in **Figure 1** above, SCE's low procurement needs scenario yields a total procurement requirement of 4,987 GWh in 2010, or 1,921 GWh, assuming full recontracting with existing projects whose contracts expire by the end of 2010. This scenario assumes that in 2010, SCE will experience lower than anticipated load

growth (-1 standard deviation from SCE's October 2005 forecast, or 91,306 GWh), its forecasted level of direct access (9,982 GWh), a production level from pre-2002 resources at a five-year historical high (10,463 GWh), and high production from resources acquired through SCE's 2002 solicitation (40 GWh). In addition, SCE assumed that output from resources contracted for pursuant to its 2003 solicitation would be 775 GWh in 2010. SCE assumed that five of the eight 2003 solicitation projects would reach their initial on-line capacities by 2010, and that four of those five projects, with the exception of the Aero Energy, LLC (Aero) project, would achieve 25% of their expansion potential by 2010. SCE also assumed that the Stirling project would achieve 23% of its initial on-line capacity by 2010, and that Green Borders and Mountain View projects would not be on-line by 2010.

Figure 4 establishes a matrix showing the relationship between these high procurement needs, base case procurement needs, and low procurement needs scenarios, and SCE's actual procurement based on those scenarios. The matrix shows the range of SCE's potential RPS compliance positions in 2010 if SCE procures to the high procurement needs, base case procurement needs, and low procurement needs scenarios. Thus, for example, if SCE procures to its high procurement needs scenario in 2010 (6,963 GWh), and the high procurement needs scenario actually occurs, SCE will be at 20% renewables in 2010. However, if SCE procures to this high procurement needs scenario, but the base case procurement needs scenario actually occurs, SCE will be at 21.2% renewables in 2010 and, if the low procurement needs scenario actually occurs, SCE will be at 22.4% renewables in 2010.

Figure 4

Total Renewable Generation as a Percentage of Bundled Sales

		2010 Level of New Procurement (GWh)		
		6,963	5,961	4,987
Which Case Occurs	High Procurement Requirement	20.0%	18.8%	17.7%
	Base Case Procurement Requirement	21.2%	20.0%	18.8%
	Low Procurement Requirement	22.4%	21.2%	20.0%

B. Anticipated Results of 2005 RFO

As discussed above, SCE's procurement needs for 2006 will be determined almost entirely by the results of its 2005 solicitation. In order to reach 20% by 2010, SCE believes that in 2006 it should procure the difference between its high procurement needs obligation of 6,963 GWh and the amount of contracted-for output available in 2010 from its 2005 solicitation. The timing of the submission of this 2006 Plan makes it somewhat difficult to predict the level of additional procurement required in 2006 because SCE has not yet completed its 2005 solicitation.

In order to protect the integrity of its 2005 RFO, SCE is unable to discuss in detail the number, quality, and type of bids received. It is far too early to predict the total GWh that will result from the 2005 solicitation. Even after SCE finalizes its short-list, SCE will conduct additional due diligence, which may result in some short-listed projects being eliminated. Additionally, experience has proven that it is

highly unlikely that SCE will contract with all of the short-listed bidders. Once contracts have been signed, each project must meet all of its milestones. Finally, as discussed in SCE's Supplement, it does not appear that there is sufficient transmission capacity to meet the requirements of SCE's 2005 solicitation. Based on these considerations, it is highly unlikely that SCE will contract for all of its high procurement needs scenario requirements in its 2005 RFO. At this time, however, SCE is unable to state with any precision, the balance of contracting that will be required in its 2006 RFO.

SCE anticipates providing a short-list to its Procurement Review Group (PRG) at approximately the time of the filing of this 2006 Plan, in December 2005. SCE anticipates completing contract negotiations with respect to its 2005 solicitation by approximately May 2006. At that time, subject to Commission approval of submitted executed contracts, SCE will have a better understanding of its overall remaining procurement obligations and the necessary additional procurement activity required in 2006. SCE plans to initiate a 2006 RFO as soon as is reasonably practicable in 2006.

III.

DISCUSSION OF ISSUES RAISED IN THE ACR

A. Analysis of Transmission Issues Related to 2006 Planning

SCE provided a detailed analysis of the transmission constraints related to its 2003 solicitation in its Supplement. As set forth in the Supplement, significant obstacles exist with respect to most of the 2003 solicitation projects, and unless prompt actions are taken to alleviate this constraint on deliverability, it appears that some of these projects will not be able to meet their anticipated on-line dates. As further explained in the Supplement, SCE also expects significant transmission upgrades to be required to interconnect most of the projects that SCE contracts with

in its 2005 and 2006 solicitations. SCE's assessment of transmission issues with respect to 2006 planning is the same as that set forth in the Supplement.⁶

SCE has performed numerous conceptual transmission studies and provided these studies to the Commission under Investigation (I.) 00-11-001. In those conceptual studies, the need for substantial transmission upgrades necessary to accommodate renewable resources was identified, and a conceptual plan was developed. Specifically, during 2002 and 2003, SCE completed conceptual transmission studies with limited funding and participation from wind and solar developers. During 2002, SCE prepared its initial Tehachapi Transmission Conceptual Plan for integrating up to 2,500 MW of wind generation in Tehachapi (Tehachapi Transmission Conceptual Facilities Report dated March 14, 2002). SCE refined the Tehachapi Transmission Conceptual Plan to include the investigation of potential Tehachapi area substation sites and line routing options in an effort to facilitate project development in anticipation of actual wind generation developers seeking interconnection (Tehachapi Transmission Conceptual Study Phase 2 dated January 15, 2003). Two additional conceptual transmission studies were performed during 2003 in order to integrate additional wind resources located in the Tehachapi area and solar resources identified near Harper Lake, which is in the North of Lugo SCE transmission system. Both of these studies developed the preliminary scope of facilities necessary to integrate proposed conceptual renewable resources in these areas.

In addition, SCE developed a conceptual transmission study, dated August 29, 2003, covering all areas identified by the California Energy Commission (CEC) in support of the Commission's investigation (I.00-11-00) into transmission constraints facing the State. This study served as the basis for addressing transmission needs in SCE's service territory (including transmission into the

⁶ SCE also anticipates that the transmission issues discussed in its Supplement may affect 2007 planning.

Imperial Irrigation District) and was utilized by the Commission's Energy Division in developing a report to the Legislature titled "Electric Transmission Plan for Renewable Resources in California" dated December 1, 2003. In that report, the Commission identified substantial transmission upgrades that were necessary to accommodate those renewable resources needed to meet the 20% RPS goal.

SCE has also performed Transmission Ranking Costs Reports (TRCRs) in 2004 and 2005, which solicited information from potential bidders who sought interconnection to the SCE-owned transmission system. The purpose of the TRCRs was to obtain information from developers of renewable energy projects in order to identify conceptual transmission upgrades required to interconnect those potential bidders, estimate the costs associated with those upgrades, and then determine an appropriate bid adder for the bids in that locale for use in the least-cost/best-fit evaluation of the bids in an utility RPS solicitation. Both of SCE's TRCRs identified that there were very few locations where transmission capacity was available to interconnect renewable resources. Nearly all locations included bid adders for any projects in those locations. Accordingly, transmission upgrades are required to interconnect any potential projects in those locations. The TRCRs identified only a few locations with available capacity that could be used to interconnect a limited amount of renewable resources; the vast majority of locations require substantial transmission upgrades to interconnect any renewable resources.

Overall, the actual bids SCE received in its 2003 and 2005 solicitations were in locations requiring transmission upgrades or in locations where the potential projects exceeded the limited available transmission capacity. It is likely that the bids in SCE's future solicitations will require similar transmission upgrades.

B. Lessons Learned From Inclusion in 2005 RFO of Delivery to Any Point in the CAISO Control Area and Bids Having Curtailability

In its 2005 solicitation, SCE was authorized to restrict in-territory bids to SP-15 delivery points. However, bidders with generating facilities located outside of

SCE's service territory were not restricted to SP-15 and were allowed to propose a delivery point anywhere within the California Independent System Operator (CAISO) control area. SCE's 2005 RFO also allows for curtailability.⁷

It appears, based on SCE's experience with its 2005 RFO, that generators were receptive to interconnection outside the CAISO control area, but were unwilling to accept curtailability as an attribute. There does not appear, therefore, to be a direct connection between allowing bids proposing delivery to any point in the CAISO control area and bids having curtailability as an attribute on the one hand, and the type and quality of bids received on the other, based on SCE's experience to date.

Interconnection outside of the CAISO control area presents unique challenges and concerns, as SCE learned in its 2003 solicitation. Although there are viable resources located adjacent to the CAISO control area, such as in Nevada, Mexico, and the Imperial Irrigation District, limited import capability and constrained transmission paths make contracts for such projects unlikely to materialize.

C. Contract Terms Related to Implementation of CAISO Market Redesign

SCE's 2005 RFO does not contain a pro-forma contract with terms concerning market redesign.⁸ SCE negotiated terms allocating risk associated with market redesign with its counterparties in its 2003 solicitation. These specific terms and conditions were negotiated between the parties as part of the overall negotiation process. The Commission approved terms pertaining to market redesign when it approved the reasonableness of these contracts.

⁷ More specifically, SCE's 2005 RFO allows for bidders to submit dispatchable bids. SCE defines dispatchable products as those generating facilities that are able to be turned on or off at any time by SCE, in its sole discretion, based on a schedule to be provided by SCE at least 24 hours before any hour to be dispatched. SCE further requires that bidders specify the fraction of their output which is dispatchable by percentage and time-of-delivery period.

⁸ As explained above, SCE's 2006 RFO will be largely identical to SCE's 2005 RFO.

SCE does not believe that it is appropriate to adopt a standard term concerning the allocation of risk associated with delivery in the event of market redesign. The appropriateness of such terms and conditions generally depend on the unique circumstances of each project and the relationship of such terms to the balance of risk and benefit negotiated between the parties as part of an integrated contract.

D. Analysis of Other Lessons Learned from 2005 RFO

As noted above, SCE has not completed its 2005 RFO. Therefore, it is not possible to conduct a *post mortem* at this time. SCE made a number of specific changes in its 2005 RFO to reflect lessons learned from its 2003 solicitation. Some of these changes are discussed in the preceding sections, and do not appear to have had a material impact on the robustness of the 2005 solicitation.

In addition to these changes, SCE incorporated other lessons learned from its 2003 solicitation. Among other things, SCE included a significantly refined and updated form of contract, based on negotiations with short-listed bidders in its 2003 solicitation. This form of contract, approved by the Commission earlier this year, will be used in SCE's 2006 solicitation. SCE also added the requirement of a refundable bid deposit. The deposit will be refunded to bidders that are not short-listed. It is unclear whether this requirement had a material impact on the overall robustness of SCE's 2005 solicitation. SCE remains convinced that a refundable bid deposit operates as an important and effective screening filter; however, SCE may revisit the level of the deposit in connection with its 2006 RFO.

Another change implemented as part of SCE's 2005 RFO is a requirement that bidders apply to the CAISO for interconnection within 10 days of being short-listed. SCE included this term to ensure that short-listed bidders begin the interconnection process early. Because SCE has not yet developed a short-list for the 2005 RFO, SCE is unable to assess the efficacy of this change. However, SCE intends to include this requirement in its 2006 RFO.

E. Possible Firm Deadline For Submission of Contracts

There are advantages and disadvantages to imposing a firm contracting deadline. As SCE and its counterparties learned at the end of SCE's protracted 2003 solicitation, a final cutoff for submitting contracts to the Commission for approval can operate as a catalyst to resolving outstanding issues in negotiations.

The Commission has already effectively imposed a deadline on the 2005 RFO by providing that 2005 RFO contracts can only be considered for earmarking towards 2005 RPS obligations if they are executed on or before June 30, 2006. SCE would not oppose a deadline for earmarking towards 2006 RPS obligations, but believes that, given the timing of the 2005 RFO cycle, such a 2006 deadline should not occur before March 31, 2007.

SCE believes that stakeholders should be given an opportunity to evaluate the effectiveness of such deadlines before "permanent" deadlines are instituted for each year. Moreover, SCE has learned from recent experience that the unique circumstances associated with specific projects and negotiations may result in delays in reaching contract execution over which neither party has control. Therefore, if the Commission decides to adopt a firm deadline for contract submission, the Commission should retain the flexibility, as it has done in the past, to consider applications for approval of RPS contracts on an *ad hoc* basis.

F. Analysis of Annual Procurement Targets (APTs) and Incremental Procurement Targets (IPTs) for 2005 and 2006

In 2005, SCE projects it will purchase approximately 12,989 GWh of energy from eligible renewable energy resources. SCE's APT for 2005 is 13,466 GWh, as computed from SCE's 2004 APT plus 1% of SCE's UDC bundled sales for 2004. SCE's IPT for 2005 is 730 GWh. No new renewable resources began operating in 2005 due to the development cycle requirements for those executed contracts approved by the Commission in 2005 and transmission upgrade requirements. SCE expects to have a shortfall of approximately 477 GWh in 2005 for its APT and 730

GWh for its IPT.⁹ SCE anticipates earmarking from its 2005 solicitation to meet any shortfalls in its RPS requirements for 2005.

In 2006, SCE projects it will purchase approximately 13,087 GWh of energy from eligible renewable energy resources. SCE's APT for 2006 is estimated to be 14,220 GWh, as computed from SCE's 2005 APT of 13,466 GWh plus 1% of SCE's projected UDC bundled sales for 2005. SCE's 2006 IPT is projected to be 754 GWh. SCE expects that no new renewable resources will begin operating in 2006 because of the development cycle requirements for those executed contracts approved by the Commission in 2005 and transmission upgrade requirements. SCE expects to have a shortfall of 1,133 GWh in 2006 for its APT and 754 GWh for its IPT. SCE anticipates earmarking from its 2005 and 2006 solicitations to meet any shortfalls in its RPS requirements for 2006.

The ACR asks for a discussion of increasing the IPT from 1% to 1.2%. As the foregoing discussion demonstrates, however, it is not physically possible to increase renewable generation in 2006 by any percentage as a result of incremental deliveries. Increasing the IPT will have no material impact on SCE's procurement activities in 2006.

Moreover, as discussed in SCE's Supplement, a Commission-mandated "margin of safety" in RPS procurement is neither necessary nor appropriate.¹⁰ It is too early in the RPS process to create a standardized "margin of safety." Neither the Commission nor SCE has any evidentiary basis for determining what "margin of safety" is appropriate. Any "margin of safety" is and should be utility- and project-specific. SCE is ultimately required to meet its RPS obligations, and accordingly will carefully consider both the probability of success of its renewable projects and

⁹ SCE's estimated IPT shortfalls for 2005 and 2006 do not consider the pending resolution of the incremental geothermal assessment of Calpine's "Geysers" facilities currently being conducted at the CEC. If the CEC determines that some portion of the Geysers' production under Calpine's contract with SCE is incremental for these years, it will reduce SCE's IPT shortfalls.

¹⁰ See Southern California Edison Company's (U 338-E) Supplement to its Renewable Procurement Plan 2005 - 2014 at 32-33 (filed Dec. 7, 2005).

the possibility that resources currently under contract will not renew their commitments with SCE. SCE will continue to assess the viability of its existing projects as they develop, and its existing contracts as they near expiration, and adjust its planning for future procurement based on this information.

As explained above, SCE plans to procure to its high procurement needs scenario. This procurement approach essentially introduces a "margin of safety" into SCE's procurement planning. This is a more effective and pragmatic approach than adopting a standardized increase in the IPT, which, as noted, will have little if any practical effect on near-term procurement.

G. Analysis of RPS-Eligible Renewable Generation Available by 2010

SCE's recent experience has not provided any particular basis for refining its assessment of the available RPS-eligible renewable generation set forth in its Long-Term Plan. Although it is possible to develop a very crude assessment of the availability of such resources based on, among other things, the CEC's report of gross technical potential and the historical mix of technologies represented in SCE's baseline, such *indicia* appear to have little predictive value.

As discussed in SCE's Long-Term Plan, the development of a "resource stack" of preferred or projected future renewable procurement has limited benefits. RPS procurement is a synergistic process between renewable developers and the utilities and other buyers of renewable energy. The developers' views of what RPS-eligible renewable resources are likely to be available is at least as important, if not more important, than the utilities' views, because the developers are uniquely situated to know whether or not particular resources are worth developing and bidding into an utility solicitation. Moreover, given SCE's experience with recent solicitations, resource types cannot be definitely "ranked;" therefore, a resource stack may be at odds with the least-cost/best-fit evaluation standards imposed by the RPS legislation. SCE also does not have an institutional preference for a particular

resource mix or technology type, and the RPS legislation does not require any specific mix of technology types.

SCE has developed a presumed resource mix for its future procurement based on consideration of a number of factors, including experience gained from SCE's 2003 solicitation, SCE's existing renewable capacity under contract, and the CEC's estimates of gross resource potential in SCE's service territory. That presumed resource mix is detailed in SCE's Long-Term Plan.¹¹

Nothing has changed since SCE filed its Long-Term Plan which would change SCE's view of the likelihood of any particular resource type or technology type materializing. Accordingly, the presumed resource mix in SCE's Long-Term Plan is a reasonable estimate of the RPS-eligible renewable resources that are likely to be available by 2010.

H. Discussion of Specific Plans for Pursuing Wind Repowering

SCE's Long-Term Plan included an anticipated 576 GWh coming on-line between 2006 and 2009 as a result of repowering or expanding existing wind projects under contract with SCE. As stated in its Long-Term Plan, SCE viewed wind repowering as the most likely source of near term incremental procurement given the long-lead times for the development of new resources. However, SCE also noted that, after applying a series of screens to detect the most likely projects and their expansion or repowering potential, the level of repowering and expansion that can actually be achieved is somewhat speculative.

Unfortunately, SCE has not received the level of response that it anticipated in view of public statements by wind industry representatives regarding the available supply of repowering and expansion GWh and the desire of existing project owners to repower and expand their facilities. SCE sent a letter to all of its

¹¹ See Southern California Edison Company's (U 338-E) Renewable Procurement Plan 2005 – 2014 at 19-24 (filed Mar. 7, 2005).

existing wind projects soliciting interest in repowering and expansion. SCE also discussed repowering and expansion opportunities and its desire to maximize that potential at its 2005 bidders' conference. Nevertheless, SCE received a very limited bilateral response to its informal solicitation of interest and received little interest in repowering in its 2005 solicitation. SCE will continue to explore wind repowering opportunities, by, among other things, possibly sending a second letter to its wind project owners and other potentially interested parties which would again seek interest in repowering and expansion and sponsoring the workshop discussed below. Given the frequent public statements of interest in repowering and expansion by wind industry representatives, it is unclear what has caused such a low response to SCE's efforts. The economics of repowering and expansion may have been adversely affected by the rising cost of steel and the rising price and unavailability of turbines.

Repowering and expansion opportunities remain an area that SCE views as important in meeting its RPS goals as they are the most obvious source of near-term procurement. SCE is willing to sponsor a workshop specifically aimed at identifying the issues and potential solutions that would encourage a more robust response from existing projects.

IV.

THE NEED TO MODIFY THE FLEXIBLE COMPLIANCE RULES

As discussed in SCE's Supplement, despite SCE's aggressive efforts to pursue cost-effective contracts for renewable energy, it will be difficult for SCE to achieve 20% renewables by 2010 given the long-lead times for new renewable projects and the time it takes to license and build new transmission facilities for these projects.¹² SCE therefore recommends that the Commission modify its flexible compliance

¹² See Southern California Edison Company's (U 338-E) Supplement to its Renewable Procurement Plan 2005 - 2014 at 28-29 (filed Dec. 7, 2005).

rules to allow earmarking for more than three years. Proposals for such a modification should be entertained during the Commission's upcoming review of RPS accounting issues and modified flexible compliance rules should be adopted promptly thereafter.

SCE also recommends that the Commission allow the utilities to use earmarking and other flexible compliance rules to satisfy their compliance requirements for 2010 (*i.e.*, to allow future deliveries from contracts executed in or before 2010 to satisfy 2010 requirements).¹² There is nothing in the RPS legislation that requires 20% meter spin by 2010. Allowing earmarking for 2010 compliance is a fair and reasonable way to address the impediment that transmission poses to timely compliance by the utilities.

¹² The utilities should also be allowed to use earmarking and other flexible compliance rules to meet their RPS obligations for years beyond 2010.

V.

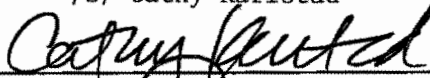
CONCLUSION

SCE respectfully requests that the Commission approve its 2006 Plan.

Respectfully submitted,

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Dated: December 22, 2005

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) 2006 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **22nd day of May, 2007**, at Rosemead, California.

/s/ Sara Carrillo
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